

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TENNESSEE STATE CONFERENCE OF
THE N.A.A.C.P., *et al.*,

Plaintiffs,

v.

TRE HARGETT, in his official capacity as
Secretary of State of the State of Tennessee, *et al.*,

Defendants.

LEAGUE OF WOMEN VOTERS OF
TENNESSEE, *et al.*,

Plaintiffs,

v.

TRE HARGETT, *et al.*,

Defendants.

Civil Nos. 3:19-cv-365; 3:19-cv-385
Hon. Aleta A. Trauger

**UNOPPOSED MOTION OF PLAINTIFFS LEAGUE OF WOMEN VOTERS OF
TENNESSEE et al. FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

Plaintiffs League of Women Voters of Tennessee, League of Women Voters of Tennessee Education Fund, American Muslim Advisory Council, Mid-South Peace & Justice Center, Memphis Central Labor Council, Rock the Vote, and HeadCount (“Plaintiffs”) respectfully move under Federal Rule of Civil Procedure 15(a)(2) for leave to file their Second Amended Complaint. Defendants do not oppose this motion. Plaintiffs’ Proposed Second Amended Complaint (“SAC”) (attached as Exhibit A) amends the previous operative complaint (ECF No. 37) in one primary respect: to assert claims under the National Voter Registration Act (“NVRA”). Specifically, the proposed SAC adds three claims under the NVRA that Plaintiffs

could not bring at the time they filed this action or for some time after the action was filed, due to the 90-day notice period the NVRA imposes after Plaintiffs notified Defendants of their NVRA violations on May 9, 2019. *See* 52 U.S.C. § 20510(b). This amendment also complies with the time limits set by the scheduling order in this case. *See* ECF No. 69 at 3.

Dated: December 4, 2019

Respectfully submitted,

/s/ Theresa J. Lee

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on December 4, 2019 by operation of the Court's electronic filing system on the following:

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